

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Verizon Massachusetts Information Requests to AT&T Communications of New England, Inc.

DATE: Original Response: May 29, 2001  
Supplemental Response: October 16, 2001

VZ-ATT 2-1: Identify the following values used by AT&T in planning its network:

- a. the route to air ratio for inter-office facilities;
- b. the actual number of minutes per month, per DS0 level switched access trunk;
- c. the investment per DS0 level trunk port;
- d. the investment per installed OC-48 ADM multiplexer (equipped with 48 DS3s and equipped with 12 DS3s;
- e. the investment per installed foot of fiber;
- f. the tandem common equipment investment;
- g. the switch installation multiplier;
- h. the power investment per switch;
- i. the cost of construction per square foot of a wire center building;
- j. the price per square foot of land that contains switch buildings;
- k. the busy hour fraction of daily usage;
- l. the annual to daily usage reduction factor;
- m. the installed terminal multiplexer investment per OC3;
- n. the interoffice facility wire center EF&I fully loaded labor rate per hour in Massachusetts;
- o. the installed cost of an OC-48 regenerator;
- p. interoffice facility fiber optic regeneration spacing;
- q. optical distribution panel cost to connect 24 fibers to the transmission equipment; and,

- r. the number of hours required to install the equipment associated with the interoffice transmission systems.

Respondent: R. Mercer

Supplemental Respondent: Jeff Ray

RESPONSE: AT&T objects to this information request on the grounds that it is overbroad, unduly burdensome, irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. This case involves Verizon-MA's forward-looking economic costs to provide UNEs. AT&T's own operational experience to date is not relevant to that issue.

SUPPLEMENTAL RESPONSE: AT&T does not use any of the listed values in planning its network.

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DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Department of Telecommunications and Energy Information Requests to  
AT&T Communications of New England, Inc.

DATE: Original Response: August 13, 2001  
Supplemental Response: October 16, 2001

DTE-ATT 1-4: Refer to pp. 42-44 of the Turner Testimony.

- a) Are the installation jobs referenced comparable to the installation jobs which are the basis of Verizon's cost studies? If not, what adjustments are necessary so that a proper comparison can be made?
- b) Does AT&T have any experience with installation of DC power plants in Massachusetts? If so, provide documentation of the installation costs.

Respondent: S. Turner

RESPONSE:

- (a) Yes. The installation jobs referenced in Mr. Turner's testimony are comparable to comprehensive DC power installation jobs that Verizon would perform in its central offices. However, Verizon did not use comprehensive DC power installation jobs in the development of its in place factor for DC power equipment and did not provide invoices AT&T requested for the comprehensive installation of DC power equipment in Massachusetts.
- (b) AT&T is in the process of gathering the requested information.

SUPPLEMENTAL  
RESPONSE:

- (b) See attached. This attachment contains proprietary information and is being provided only to the Department and parties that have signed a protective agreement with AT&T.

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. NO. 01-20

REQUEST: Department of Telecommunications and Energy Information Requests to  
AT&T Communications of New England, Inc.

DATE: October 16, 2001

VZ-ATT/WC 1-90: Referring to page 44 of the Turner testimony:

- a) Provide the job specifications that were used to develop AT&T's installation factor of 1.454.
- b) What size power plants in amps is the installation factor of 1.454 based on?
- c) What is the exact amount of the installation labor contained in the 1.454 installation factor? Explain why this amount is used.
- d) What is the exact amount of Vendor engineering costs contained in the 1.454 installation factor? Explain why this amount is used.
- e) What is the exact amount for hauling and hoisting costs contained in the 1.454 installation factor? If none, explain why not.
- f) What is the exact amount of warehousing costs contained in the 1.454 installation factor? If none, explain why not.
- g) What is the exact amount of transportation costs contained in the 1.454 installation factor? If none, explain why not.
- h) What is the exact amount of in-house engineering costs contained in the 1.454 installation factor?
- i) What state(s) were the power plant installations performed in that were used to develop the 1.454 installation factor?
- j) Provide the number and type, size, and components of the power plants used in the development of the 1.454 installation factor.

Respondent: S. Turner

RESPONSE:

(a)-(j): See attached. This attachment was originally provided as a discovery response in Pennsylvania. This attachment contains proprietary information and is being provided only to the Department and parties that have signed a protective agreement with AT&T.